



# **CWC DWMUs Closure Plans Overview**

**Presented to Ecology  
8-20-13**

# Overall CWC Outside Storage Area A and B Closure Strategy

- Outdoor Storage Area A and Outdoor Storage Area B closure activities will take place over an extended period of time (determined by TPA Milestone M-091-00).
- CWC Outdoor Storage Area A and Outdoor Storage Area B will be clean closed based on near-term and extended actions.
- DOE/CHPRC will propose in the CWC Closure Plan an extended closure period.
  - Will reference the Ecology clean closure guidance & TPA to justify the extension of closure past 180 days
- Closure Plan will include a SAP (see Slide 4 for details)
- Once the PMR is issued, that extended closure period will be approved by Ecology
- Any updates to the closure plan and SAP once waste has been removed will be submitted as a PMR (if needed).

# CWC Outside Area A and Area B Closure: Near-term Activities & Extended Actions

## Near-term Closure Actions:

- A records review will be completed for records up through closure plan submittal (August 2013)
  - One item of concern noted on records search: Box 231ZDR-11 (2012)
- A visual/physical inspection will be completed of the gravel areas currently accessible (i.e. not under the boxes or restricted due to CA)

## Extended Closure Actions:

- Weekly Inspections will continue in accordance with Addendum I approved for the Part V CWC closing unit group (includes AO items)
- Waste will be removed per M-91 & the PMP (assumes transportation of majority of waste to existing off-site waste capabilities)
- Once waste removed, DWMU operating records will be reviewed again from August 2013 to the removal of last waste date
- A second visual/physical inspection will be conducted once all waste has been removed to identify any stains/areas of concerns
- Update the SAP to incorporate any issues identified during the walkdowns if needed (approved via a future PMR)

# CWC Area A and Area B SAP Strategy

- Closure Plan will include a SAP based on known conditions & field walkdowns conducted as of August 2013.
- SAP will be attachment to closure plan
- SAP will include DQO concepts
- Sampling will be conducted over Area A and Area B using the results from the Visual Sampling Plan
- Judgmental-focused sampling is proposed in the storage location once container 231ZDR-11 is removed, based on records search that identified an area of concern.
- After ALL waste is removed, if needed judgmental sampling will be conducted on waste related staining discovered during the visual/physical inspection
- Any updates to SAP will be via permit modification

# CWC 2401-W Building Closure Strategy

- 2401-W Building will be clean closed.
- All dangerous/mixed waste has been removed.
- A records review will be completed prior to submittal of the CWC Closure Plan.
- A visual/physical inspection has been completed to identify any waste related staining.
- Decontaminate the floor using the appropriate alternative treatment standards in 40 CFR 268.45 to meet the definition of a “clean debris surface”.
  - Rinsate will be collected and sampled.
  - Sample results will be compared with the Universal Treatment Standards in 40 CFR 268.48.
- Once clean closed, 2401-W Building will not be used for dangerous waste storage; will be used primarily for equipment & material storage